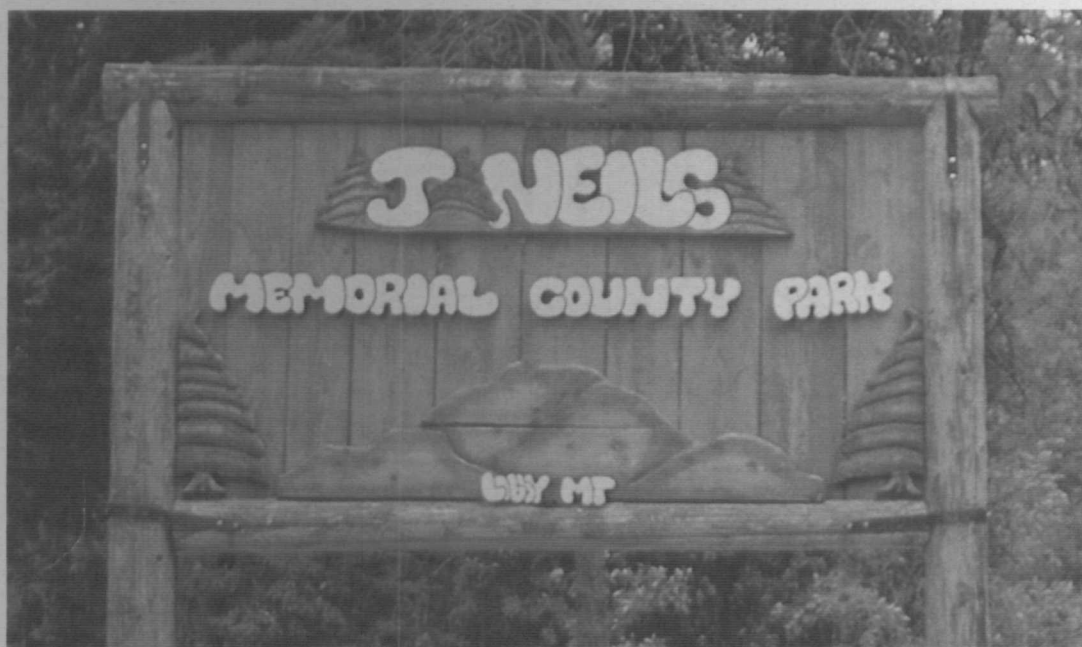




Contaminant Screening Study Libby Asbestos Site, Operable Unit 4 Libby, Montana

Draft Sampling and Analysis Plan Addendum
for J. Neils Park and State Highway 37

July 2003



*Sampling and Analysis Plan
Addendum*

Response Action Contract
for Remedial, Enforcement Oversight, and Non-Time
Critical Removal Activities at Sites of Release or
Threatened Release of Hazardous Substances
in EPA Region VIII

U.S. EPA Contract No. 68-W5-0022

Draft Sampling and Analysis Plan
Addendum for J. Neils Park and State Highway 37,
Contaminant Screening Study,
Libby Asbestos Site, Operable Unit 4

July 9, 2003

Work Assignment No.: 137-RIRI-08BC
Document Control No.: 3282-137-PP-SAMP-17907

Prepared for:
U.S. Environmental Protection Agency
Region VIII
999 18th Street, Suite 500
Denver, Colorado 80202

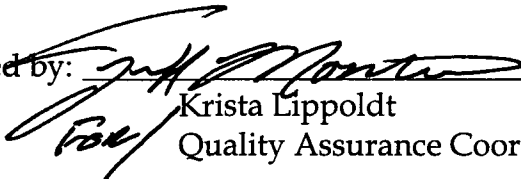
Prepared by:
CDM
1331 17th Street, Suite 1050
Denver, Colorado 80202

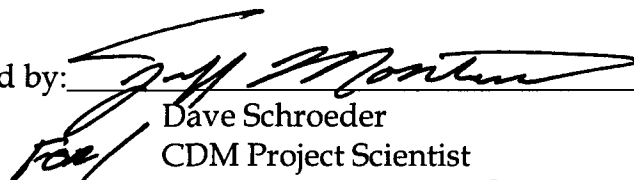
Response Action Contract
for Remedial, Enforcement Oversight, and Non-Time
Critical Removal Activities at Sites of Release or
Threatened Release of Hazardous Substances
in EPA Region VIII

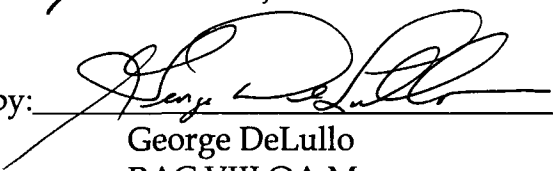
U.S. EPA Contract No. 68-W5-0022


Draft Sampling and Analysis Plan
Addendum for J. Neils Park and State Highway 37,
Contaminant Screening Study,
Libby Asbestos Site, Operable Unit 4

Work Assignment No.: 137-RIRI-08BC

Prepared by:  Date: July 9, 2003
Krista Lippoldt
Quality Assurance Coordinator

Reviewed by:  Date: July 9, 2003
Dave Schroeder
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Reviewed by:  Date: 7/1/03
George DeLullo
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Approved by:  Date: 7/10/03
Jim Christiansen
EPA Region VIII Remedial Project Manager

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Attachments

1	Information Field Form and Logbook Pages from the August 2002 J. Neils Park Site Visit
2	Field Sample Data Sheet for Soil
3	Consent for Entry and Access to Property Form for J. Neils Park
4	Letter Requesting Encroachment Permit

Acronyms

bgs	below ground surface
CDM	CDM Federal Programs Corporation
CSF	close support facility
CSS	contaminant screening study
EPA	U. S. Environmental Protection Agency
ft	feet
GPS	global positioning system
LA	Libby amphibole
PM	project manager
pt	point
QC	quality control
RAC	Response Action Contract
RI	remedial investigation
SAP	sampling and analysis plan
SOPs	standard operating procedures

Section 1

Introduction

This addendum outlines the site-specific requirements to conduct remedial investigation (RI) activities at J. Neils Park (Park Site) and along Montana State Highway 37 (Highway Site). Only surface soil sampling will be conducted at each site. All rationale, data quality objectives, quality assurance procedures, and standard operating procedures (SOPs) from the contaminant screening study (CSS) sampling and analysis plan (SAP) Revision 1 still apply (CDM Federal Programs Corporation [CDM] 2003a).

1.1 Site Location and Background

1.1.1 J. Neils Park

The Park Site is situated northeast of the Town of Libby, Montana (Figure 1-1). The property is owned by Lincoln County Parks Department. The Park Site is located north and west of the Kootenai River, south of State Highway 37, and east of Pipe Creek Road. The address for the Site is:

State Highway 37 North
Libby, Montana 59923

The Park Site encompasses approximately 100 acres and includes the following features as presented in Figure 1-2:

- Horse path
- Walking path
- Access road
- Horse arena
- Ice rink
- Playground
- Parking area
- Ball field and concession stand
- Soccer field
- Remote control field
- Forested area

The park began construction and operations in 1994-1995. Prior to use as a park, the cleared area of the Park Site was an airfield for the U.S. Forest Service, and the forested area had no previous commercial, industrial, or residential use.

1.1.2 Highway 37

The Highway Site is north of the Town of Libby (Figure 1-1). It is located primarily north of the Kootenai River, with a short segment south of the river as indicated in Figure 1-3. The highway investigation will focus on the section from the Burlington Northern railroad tracks approximately $\frac{1}{8}$ of a mile south of the Kootenai River to the junction of the highway with Rainy Creek Road. This length of the highway section is approximately $5\frac{1}{2}$ miles long and extends in a northeast/southwest direction. The road has been used as a public thoroughfare, including the transportation of vermiculite ore from Vermiculite Mountain to the location of the former Export Plant on the north side of the Kootenai River and possibly into the Town of Libby. The reason that this portion of the highway was chosen to sample is that there is no information to suggest that vermiculite ore was transported on the highway east of the junction with Rainy Creek Drive. However, Rainy Creek Drive is no longer in use (i.e., there is no reason to continue to sample up the road to Vermiculite Mountain), and if any vermiculite was transported into town south of the railroad tracks, the sampling of properties as described in the CSS SAP Revision 1 (CDM 2003a) will locate that contamination.

1.2 Objective

The objective of this SAP addendum is to present and discuss site-specific surface soil sampling plans for both the Park and Highway Sites. This information will be subsequently used as part of the RI investigation conducted at the Libby Asbestos Site, Operable Unit 4.

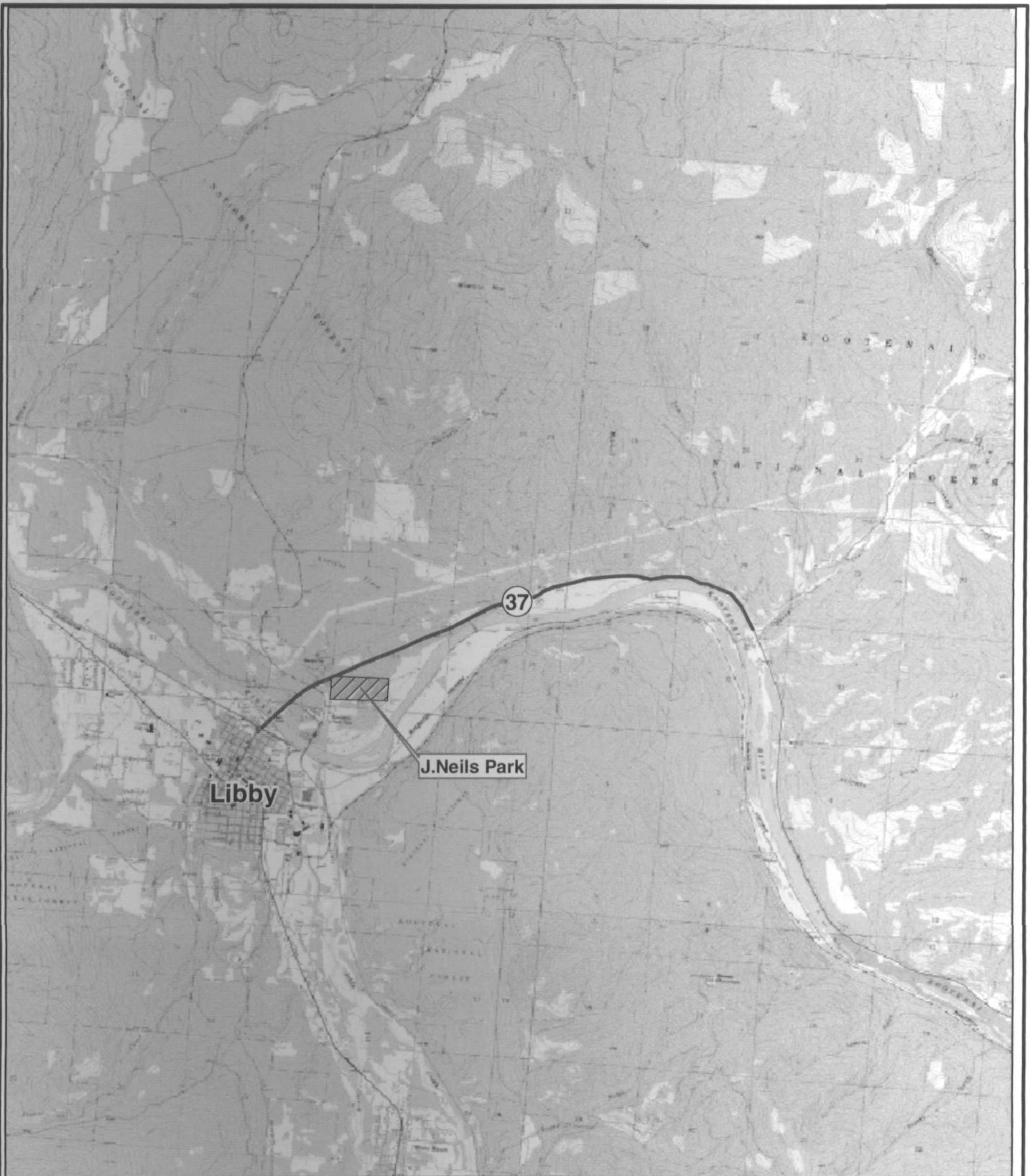


Figure 1-1
Site Location
J. Neils Park and State Highway 37
Libby, Montana

Color Map(s)

The following pages
contain color that does
not appear in the
scanned images.

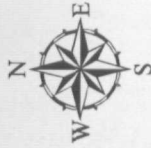
To view the actual images, please
contact the Superfund Records
Center at (303) 312-6473.

Figure 1-2
Sample Location Map
J. Neils Park
Libby, Montana

Legend

- Sampling Point
- Grid Boundary
- Grid
- Site Boundary
- Horse Path
- Walking Path
- Access Roads
- Buildings
- Existing Parking Area
- Horse Arena
- Remote Control Area
- Ice Rink
- Soccer Field

GPS Coordinates
X= Easting
Y= Northing



CDM

GPS Coordinates (UTM Meters)

Station ID	X (Easting)	Y (Northing)	Station ID	X (Easting)	Y (Northing)
1	1996644.709	17591664.04	13	1997461.548	17591585.96
2	1995764.806	1759141.51	14	1997230.31	17591498.87
3	1996242.296	17591315.68	15	1996999.073	17591417.79
4	1996473.533	17591405.78	16	1996770.839	17591330.7
5	1996713.78	17591492.87	17	1996533.595	17591249.62
6	1996939.011	17591573.95	18	1996302.358	17591162.53
7	1997173.252	17591667.05	19	1996062.111	17591072.43
8	1997404.489	17591745.13	20	1995815.858	17590991.35
9	1997641.733	17591835.22	21	1996635.7	17591117.48
10	1997875.973	17591925.31	22	1996842.913	17591135.5
11	1997936.035	17591757.14	23	1997011.085	17591252.62
12	1997701.794	17591670.05			

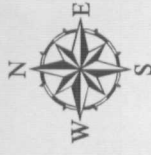
Figure 1-3
Sample Location Map
State Highway 37
Libby, Montana

Legend

— Highway 37

○ Sampling Point

GPS Coordinates
X= Easting
Y= Northing



Miles



CDM



Section 2

Field Activities

As discussed in the CSS SAP Revision No. 1, activities at the properties would normally consist of verbal interviews, visual inspections, and surface soil sampling. Because there is no readily available contact to interview for the Highway Site, no verbal interview will take place for this site. Also, it is not feasible to visually inspect the highway because of the length of the section and the dense vegetation along the road and, therefore, no visual inspection of the Highway Site is scheduled.

2.1 Verbal Interview Park Site

A verbal interview to discuss concerns and obtain historical information about the Park Site was conducted between CDM field personnel and Ms. Carol Ann Peltier, the director of the park, on August 6, 2002. An information field form was completed at that time and the Park Site was assigned number AD000680. During the interview, a figure of the park was obtained (basis for Figure 1-2). Ms. Peltier explained to the CDM field personnel that, to her knowledge, the only building that was insulated is the concession stand and that the insulation was not vermiculite.

2.2 Visual Inspection Park Site

CDM field personnel conducted an inspection for visible vermiculite of the Park Site including all structures (i.e., all structures listed in Section 1.1.2) on August 6, 2002. All structures are constructed of either wood or metal. During the inspection, it was noted that vermiculite was identified in trace amounts on two of the ball fields (i.e., numbers 3 and 4), between the bathrooms and the playground area located near the service area, and at the south entrance to the horse arena. Because vermiculite was identified at these locations, the sampling strategy has included sampling at these areas. The field team recorded specific details in Field Logbook No. 100096, pages 98 and 106, and on the property sketch portion of the information field form. Copies of these logbook pages and the field form are included in Attachment 1.

2.3 Soil Sampling

The soil sampling process, as discussed in the CSS SAP Revision No. 1, will involve the following steps:

- Locate the predetermined sample location and select composite subsample locations
- Collect samples from composite locations
- Complete the sample field forms included in Attachment 2 (e.g., record subsample locations) and sketch additional structures, features, etc. not already on the site map
- Decontaminate all nondisposable sampling equipment

2.3.1 Sample Locations and Rationale

Sample locations are mapped on each of the site figures (Figures 1-2 and 1-3), with the State Plane coordinates listed next to them. The following sections describe the sample locations and include the rationale for selecting these locations.

2.3.1.1 Park Site

To select the sampling locations, the site was divided into four types of sampling strategies. These include the pathways (i.e., horse path, walking path, and access road), the cleared area (i.e., the ball fields and previous airfield), the forested area, and the areas where visible vermiculite was identified during the visual inspection.

Sample locations were identified for the pathways at 300-foot intervals. For each set of global positioning system (GPS) coordinates noted in Figure 1-2, one sample will be collected which will be a composite of one subsample from each side of the path or road. If one side of the road cannot be sampled due to obstacles, etc., a second subsample will be collected approximately 15 feet from the sample location on the side of the road that can be sampled. It was determined that this sampling strategy would best define any contamination along the pathways.

The cleared area was gridded into approximately 250-foot by 200-foot squares. The center of each grid square was chosen as a sampling location unless the center was not within the site boundaries. If the center was not within the boundaries, the sampling location for that grid was either deleted or moved to a point on the property (e.g., the sampling point in the square where the majority of the horse arena is situated was deleted because the arena takes up most of the grid squares). Each sample will consist of five subsamples, one from the center and one from 75 feet from the center in each direction (i.e., north, south, east, and west). This sampling design was selected to provide an even distribution of samples across the cleared area, which will generally characterize the nature and extent of contamination across the ballfields and airfield.

For the forested area, three sampling locations were chosen that were accessible and cleared. Each sample will be a composite of five subsamples, one from the center location and four from 75 feet (ft) away from the center in each of four directions (i.e., north, south, east, and west). There is no evidence to indicate that the forested area contains Libby amphibole (LA), and the cleared areas in the forest would be the most likely place for LA to be spilled or dumped. Therefore, these locations were selected to provide verification that the forested region does not contain LA.

During the visual inspection, vermiculite was identified in ball fields 3 and 4, between the bathroom and playground, and near the south entrance of the horse arena. No samples will be collected in these specific areas at this time except for the ball fields where samples will be collected under another sampling strategy to access contamination of the cleared area. It is assumed that these specific areas, where vermiculite was identified visually, will be remediated and, therefore, sampling is not required.

For each sampling location presented in Figure 1-2, each coordinate set will be located using the navigation function of the GPS equipment. Once located, the coordinates will be quality control (QC) checked by a second field member. If the sample location needs to be moved, the new coordinates will be recorded. This location will be considered the new sampling location for the pathways or the new center subsample location for the other areas.

2.3.1.2 Highway Site

CDM will coordinate with the Montana Department of Transportation to determine if permits are required to sample along the highway. The Highway Site was segmented into ¼-mile sections for sample location selection. The GPS coordinates in Figure 1-3 represent ¼-mile segments along the road with an additional two sample locations near the Kootenai River. At each of these ¼-mile intervals and the two locations near the river, one sample will be collected from each side of the highway. At each sample location (one on each side of the highway), three subsamples will be collected. Each of the subsamples will be collected from within 10 feet from the highway and no further than 20 feet from the highway (i.e., to stay within the highway right of way). These subsamples include the center location and one on each side parallel to the highway and approximately 100 feet from the center subsample location. If a smaller right of way is encountered, sampling teams will use professional judgment to determine appropriate subsample locations. These sample locations were chosen to provide a general idea of the nature and extent of contamination adjacent to the highway.

2.3.2 Sample Collection

Surface soil samples will be collected from all designated sample locations. The locations of these samples are provided in Figures 1-2 and 1-3. Sampling is expected to last approximately 10 days.

Surface soil samples will extend from the surface to approximately 6 inches below ground surface (bgs). All surface samples will be collected in accordance with procedures identified in the CSS SAP Revision 1 (CDM 2003a). The surface samples will only identify surficial contamination and, therefore, if any subsurface contamination is anticipated from the surface sample analyses, subsurface samples may be collected at a later date. QC samples will be collected in accordance with the CSS SAP Revision 1 except equipment blanks will be collected at a rate of one per site per day (CDM 2003a).

2.3.2.1 Park Site

All park site samples will consist of either a 5-point (pt) composite (cleared, forested, and previously identified areas of the Park Site) or a 3-pt composite (paths). The 5-pt composite samples will be comprised of a center subsample located at the coordinates listed in the site figures and four additional subsamples approximately 75 ft on each directional side of the center subsample (i.e., north, south, east, and west). The 3-pt

composite samples will be collected from one center subsample location and two subsample locations parallel to the pathway, 10 feet apart.

2.3.2.2 Highway Site

All highway site samples will consist of 3-pt composite samples. These composite samples will be collected from one center subsample location and two subsample locations parallel to the road and 100 feet apart.

2.3.3 Field Form Completion and Feature/Structure Sketch

For each sample collected, a field sample data sheet for soil (Attachment 2) will be completed. Each form will identify the samplers, sample identification numbers, and location of subsamples and will be completed in accordance with SOP CDM-LIBBY-03, Completion of Field Sample Data Sheets and Addendum No. 3. The sample identification number associated with the sample point will be in the form of CS-#####. For each sample collected, a GPS point will be recorded from the center location of the subsamples. The other subsample locations will be identified using a compass and measuring instrument. For each of these non-center subsample locations, the distance and direction from the center location will be recorded. Any obstacles or reasons for movement or deletion of a sample or subsample will be recorded on the field form. Additionally, any structure or other relevant feature (e.g., building, pathway, etc.) not already on the site figures will be sketched onto a copy of the site figure or sample form.

2.3.4 Decontamination

All decontamination will be conducted in accordance with the CSS SAP Revision 1 (CDM 2003a). All non-disposable sampling equipment will be decontaminated between sample locations but will not be decontaminated between subsample locations.

Section 3

Sample Analysis and Data Validation

Soil samples will be prepared for analysis following the close support facility (CSF) Soil Preparation Plan (CDM 2003b). The analytical program that will be used for identifying LA in soils will be determined following the current performance evaluation study being conducted by the U.S. Environmental Protection Agency (EPA). Once a determination is made regarding the analytical approach, this SAP will be amended. EPA is currently developing data validation criteria for soil sample results. When these procedures are established, the CSS Revision 1 SAP will be amended to include these procedures.

When sample data packages are received, the Response Action Contract (RAC) Region VIII project manager (PM) will coordinate the data validation and entry of qualifiers added during validation to results in the Libby project database.

Section 4

References

CDM 2003a. Final Sampling and Analysis Plan, Remedial Investigation, Contaminant Screening Study, Revision 1. May

_____. 2003b. Soil Preparation Plan, Remedial Investigation, Contaminant Screening Study, Libby Asbestos Site, Operable Unit 4. April

Attachment 1
Information Field Form and Logbook Pages
From the August 2002 J. Neils Park
Site Visit

T.V. AD- 000680

8/7/02

T.

AD- 000680

8/7/02

VOID/BD

☐ Soil samples collected (Date: _____)

LIBBY ASBESTOS PROJECT
Contaminant Screening Study
Primary Structure and Property Assessment Information Field Form

Field Logbook No.: 100096 Page No.: 98 Site Visit Date: 8-6-02
 Address: J NEILS PARK HWY 37 N Structure Description: J NEILS PARK
 Occupant: CAROL ANN PELTIER Phone Number: 293-7781 x 238
 Owner (if different than occupant): LINCOLN COUNTY PARKS Phone Number: 293-7781 x 238
 Sampling Team: GWEN POZEBA, TOM VANDERWEELE CDM
 Field Form Check Completed by (100% of forms): Gwen D. Fager CDM
 Screening Field Check Completed by (2% of forms): _____

Data Item	Value	Notes
HOUSE ATTRIBUTES		
Property Description	Residential Industrial Commercial	<u>COUNTY PARK</u>
Surrounding Land Use	<input checked="" type="radio"/> Residential <input type="radio"/> Industrial <input checked="" type="radio"/> Commercial School Mining Other: _____	
Year of Construction	<u>1994-1995</u> Unknown	
Square Footage	<u>100 ACRES - 72.5 ACRES, 22.5 ACRES OFF CHAMPION HALL RD</u>	
Construction Material	<input checked="" type="radio"/> Wood frame <input type="radio"/> Masonry/Stone Other: <u>METAL</u>	<u>BUILDINGS ON PARK LAND</u>
Number of Floors Above Ground	1 2 3 Other: <u>NA</u>	
Number of Rooms Per Floor Above Ground	1: _____ 2: _____ 3: _____ Other: <u>NA</u>	
Basement	Yes <input checked="" type="radio"/> No	
Heating Source	Wood/Coal Electric Propane/Gas <input checked="" type="radio"/> Other: <u>SUN</u>	
Heat Distribution	Forced air <input checked="" type="radio"/> Radiant Other: _____	

(ROBERT)
 GROUNDSKEEPER

CSS INFORMATION FIELD FORM (continued)

A.D.# 000680

Address: HWY 37 N

BD# _____

Data Item	Value	Notes
OCCUPANT INFORMATION		
Number of Adults/Employees	0 1 2 3 4 5-15 16-20 21-30 >30	VARIES
Number of Children	0 1 2 3 4 Other: _____	VARIES
Years at Location	<1 1-5 5-10 10-15 >15	8 YRS.
Was the residence/building remodeled?	Yes (No) If yes, When (years): <2 2-5 >5 Where: Attic Living Areas Garage Basement Other: _____	
Has resident/business purchased any Libby vermiculite materials from W.R. Grace in the past?	Yes (No)	
Has the property at this location been used for a for-profit enterprise of distributing, treating, storing, or disposing of Libby vermiculite?	Yes (No)	
Are there any known areas of exposed vermiculite?	Yes (No) If yes, Where: Ceiling Walls Floors Attic Other: _____	

CSS INFORMATION FIELD FORM (continued)

Address: Hwy. 37 N.

BD# _____

Data Item	Value	Notes
INDOOR ASSESSMENT		
Vermiculite Insulation Past or Present	Attic: Yes <input checked="" type="radio"/> No <input checked="" type="radio"/> NA <input type="radio"/> Unknown Walls: Yes <input checked="" type="radio"/> No <input checked="" type="radio"/> NA <input type="radio"/> Unknown Basement: Yes <input type="radio"/> No <input checked="" type="radio"/> NA <input type="radio"/> Unknown Crawl Space: Yes <input type="radio"/> No <input checked="" type="radio"/> NA <input type="radio"/> Unknown Other: _____	Visual confirmation of current presence or absence required for attic.
Evidence of Physical Damage?	Yes <input checked="" type="radio"/> No <input type="radio"/>	
Evidence of Water Damage?	Yes <input checked="" type="radio"/> No <input type="radio"/>	
OUTDOOR ASSESSMENT		
Libby Amphibole Sources Present	Garden: Yes <input type="radio"/> No <input checked="" type="radio"/> NA <input type="radio"/> Yard: Yes <input checked="" type="radio"/> No <input type="radio"/> NA <input type="radio"/> Stockpiles: Yes <input type="radio"/> No <input checked="" type="radio"/> NA <input type="radio"/> Other: <u>BALLFIELDS #3 + #4</u>	BETWEEN BATHROOMS + PLAYGROUND, ENTRANCE TO HORSE ARENA. TRACE VERMICULITE OBSERVED
Proximity to Other Properties with Potential Sources of Libby Amphiboles	Next door Within same block Other: _____ <input checked="" type="radio"/> Unknown	

AD # 000680

CSS INFORMATION FIELD FORM (continued)

Address: Hwy 37 N.

BD# _____

Data Item	Value	Notes
EXPOSURE ASSESSMENT		
Type and Frequency of Activity Near Vermiculite Material - Indoor	Frequency:	Once a day Once a week Once a month Once a year <u>Not Applicable</u>
	Duration of Contact:	<1 hour 1-2 hours 2-4 hours >4 hours <u>Not Applicable</u>
	Extent of Contact:	Heavy Moderate Light <u>Not Applicable</u>
Type and Frequency of Activity Near Vermiculite Material - Outdoor	Frequency:	Once a day Once a week Once a month Once a year Not Applicable
	Duration of Contact:	<1 hour 1-2 hours 2-4 hours >4 hours Not Applicable
	Extent of Contact:	Heavy Moderate Light Not Applicable

Address: Hwy 37 N.

BD#

Data Item	Value	Notes
CONTAMINANT SCREENING STUDY ASSESSMENT		
Occupant Information		
Is there any knowledge of former miners, close relative of miners, or any highly exposed persons living or visiting the property?	Yes Unknown	No
Is the resident, past or present, diagnosed with an asbestos related disease?	Yes Unknown	No N/A NO RESIDENTS
Indoor Information		
Does the interior have Zonolite attic insulation?	Yes Unknown	No
Did the interior ever have Zonolite attic insulation?	Yes Unknown	No NA NA applies if attic currently has ZAI.
Are there vermiculite additives in any of the building materials?	Yes Unknown	No NONE OBSERVED
Outdoor Information		
Is there any evidence of primary source materials at or near the property?	Yes Unknown	No TRACE AMOUNTS
Could this have been tracked indoors or otherwise spread outdoors on the property?	Yes Unknown	No
Overall Assessment		
Are primary source materials present at the property?	Yes No	
Where are primary source materials located?	Inside Both	Outside NA
ADDITIONAL INFORMATION		

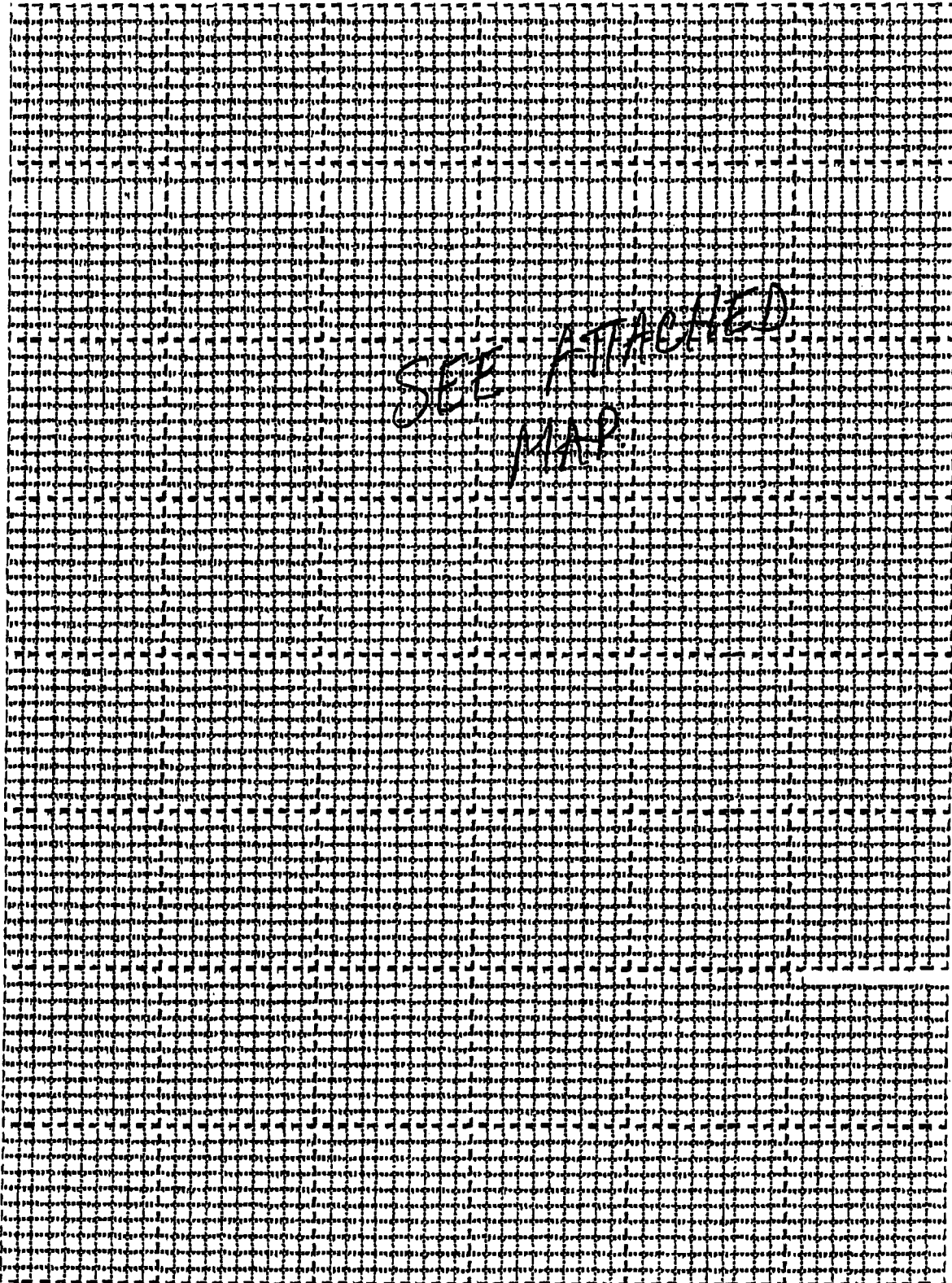
Address: Highway 37N

BD#

FIELD DIAGRAM OF PROPERTY

Identify important features (i.e. drainage, trees, gardens, structures, flowerbeds, utility poles, known underground utilities, suspected Libby amphibole source areas, sample locations, etc).

NOT TO SCALE



Address: Hwy. 37 N

BD# _____

FIELD DIAGRAM OF PRIMARY STRUCTURE

Floor of House (circle): First Second Third Basement

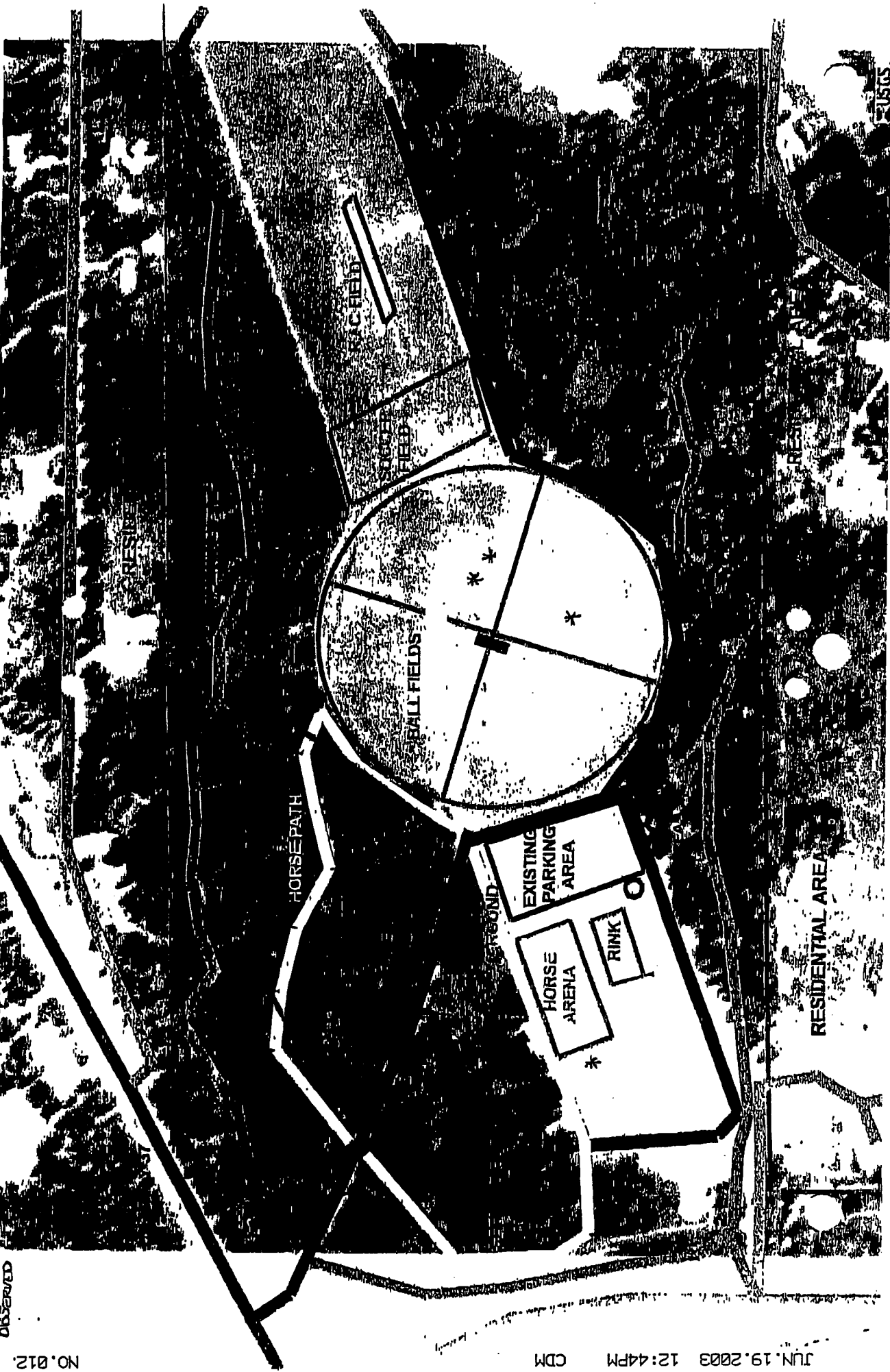
Include approximate dimensions of rooms and floor covering type. Use more than one diagram if needed. Completed only if ZAI is present.

Scale: 1/10" = 1 foot

A large grid of graph paper, approximately 30 units wide by 40 units high, intended for drawing a field diagram of a primary structure. The grid is composed of small squares, with some lines slightly thicker than others to form a larger grid pattern. The grid is currently blank, with no drawings or text on it.

* = REMOVED
OBSERVED

J. NEILS PARK Hwy 37 N



3 Location J. Neils Park Hwy 37N Date 8/6/02
Project / Client Volpe/EPa

Lincoln County Parks and Recreation BD001365
Carol Ann Peltier (Director)

300- Met with Carol Ann Peltier at site. Complete BD-001365 consent form and information field form. Assign field form BD #001365. Buildings on site are not insulated except for baseball field concession stand. Baseball field concession stand does not have lava. Walking path, horse trail, skating rink, ball fields, horse arena, soccer field, r/c field, parking areas and playground areas were walked and canvased for vermiculite. Vermiculite was observed in trace amounts on two ball fields and a playground by service areas and at south entrance to horse arena. ^{SEP 24/02} ARENA PHOTO TAKEN AND MAP PICTURE OF PARK OBTAINED FROM LINCOLN COUNTY.

Page 1
Sum D. Volpe
8/6/02

Location Libby, Montana Date 8/7/02
Project / Client Volpe/EPa
MORNING MEETING TEMP 50°F

0800- Arriving onsite at office trailer for daily meeting and health and safety meeting. Author: Gwen D. Pzega (CDM) Sum D. Volpe TEAM 1 RECON ACTIVITIES FOR THE DAY ARE CSS RECON. TEAM MEMBERS ARE TOM VANDERBEEK AND GWEN PZEGA. PPE IS MODIFIED C FOR ATTIC ENTRIES. TITLE GOV. DEC. FINAL SAP R1 LIBBY ASBESTOS SITE OPERABLE UNIT 4. EQUIPMENT INCLUDES: KODAK DIGITAL CAMERA RECON #1, (KCKAI21503967), RADIO RECON #1, HEDA VAC (#15844), 6' LADDER, EXTENSION LADDER, KIDDE FIRE EXTINGUISHER (#237212), FIRST AID KIT.

Page 2
Sum D. Volpe
8/7/02

Location J NEILS PARK Hwy 37N Date 8/7/02
Project / Client VOLPE/IEPA
ATE ENTRY AD 000680

TE ENTRY FOR PAGE #98 FIELD BOOK
096, AD-000680 BD#001365 VOIDED AND
NEILS PARK ASSIGNED AD#000680. THIS
DUE TO THE PARK BEING OWNED BY
COLN COUNTY. NO ACTUAL PHYSICAL
PRESS FOR PARK. STRUCTURES ON SITE
NOT CONTAIN LHA.

Volpe
D. 8/7/02

Location 765 SHALON DRIVE Date 8/7/02
Project / Client VOLPE/IEPA
GERARD RECKIN BD 001368

1530- ARRIVE AT SITE. TALK WITH
GERARD BD-001368 RECKIN (OWNER).
COMPLETE CONSENT FORM AND INFORMATION
FIELD FORM. ASSIGN FIELD FORM BD#
001368. NO LHA OBSERVED INDOORS.
TRACE AMOUNT OF VERMICULITE SEEN
OUTDOORS IN ONE FLOWERBED. PHOTO
TAKEN AND SKETCH DRAWN.

Volpe
D. 8/7/02

Attachment 2

Field Sample Data Sheet for Soil



Addendum to Completion of Field Sample Data Sheets

Project: Libby Asbestos Remedial Investigation - Contaminant Screening Study (CSS)

Project Number: 3282-137

Specific Site: J. Neils Park and State Highway 37

Document No.: CDM-LIBBY-03 ADDENDUM NO. 3

Project Manager: [Signature] Date: July 9, 2003

Technical Reviewer: [Signature] ^{For} Date: July 9, 2003

EPA Approval: [Signature] Date: _____

The field sample data sheet (FSDS) must be completed using the original SOP and this SAP Addendum.

All categories will be completed in accordance with the original SOP with the following changes and/or additions:

Address: The center sample coordinates. For the pathway samples in J. Neils Park, the location in the pathway or road between the subsample locations will be considered the center sample location. Coordinates are to be entered in the following format:

N - Number, E - Number

Sample Group: The sample group for the J. Neils Park or State Highway 37 soil samples do not have to be one of the list in the original SOP. The sample group should describe the surrounding area (e.g., forest, soccer field, grass next to highway, etc.).

Location Description: The subarea (i.e., either State Highway 37 or the sampling strategy category if location is in J. Neils Park) where the center sample is located.

Field Comments: The subsample locations should be identified here. Locations are to be entered in the following format:

- 1) Direction (e.g., N5°E), Feet from Center Sample (e.g., 12.5')
- 2) Direction (e.g., N80°E), Feet from Center Sample (e.g., 11')
- 3) Direction (e.g., N85°WE), Feet from Center Sample (e.g., 15')
- 4) Direction (e.g., S10°E), Feet from Center Sample (e.g., 19')

Also in this field, any obstacles should be noted along with reasons for moving a location or not collecting one of the subsamples.

**CONTAMINANT SCREENING STUDY/REMEDIAL INVESTIGATION
FIELD SAMPLE DATA SHEET (FSDS) FOR SOIL**

Scenario No.: NA Field Logbook No.: _____ Page No.: _____ Sampling Date: _____

Address: _____ Owner/Tenant: _____

Business Name: _____

Land Use: (circle) Residential School Commercial Mining Roadway Other ()

Sampling Team: (circle) CDM MACTEC Other _____ Names: _____

Data Item	Sample 1	Sample 2	Sample 3
Index ID			
Location ID			
Sample Group			
Location Description (circle)	Back yard Front yard Side yard Driveway Other _____	Back yard Front yard Side yard Driveway Other _____	Back yard Front yard Side yard Driveway Other _____
Category (circle)	FS FD of _____ Field Blank (lot or equipment)	FS FD of _____ Field Blank (lot or equipment)	FS FD of _____ Field Blank (lot or equipment)
Matrix Type (Surface soil unless other wise noted)	Surface Soil Other _____	Surface Soil Other _____	Surface Soil Other _____
Type (circle)	Grab Comp. # subsamples _____	Grab Comp. # subsamples _____	Grab Comp. # subsamples _____
Sample Time			
Top Depth (in.)			
Bottom Depth (in.)			
Field Comments Note if vermiculite is visible in sampled area	BD- _____	BD- _____	BD- _____
Entered (LFO) _____	Volpe: Entered _____ Validated _____	Volpe: Entered _____ Validated _____	Volpe: Entered _____ Validated _____

For Field Team Completion
(Provide Initials)

Completed by _____

QC by _____

Attachment 3
Consent for Entry and Access to
Property Form for J. Neils Park

~~T.V.~~ AD- 000680

8/7/02

~~T.V.~~ BD- 001365

8/6/02

VOID
B.D.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
999 18TH STREET, SUITE 300
DENVER, CO 80202

CONSENT FOR ENTRY AND ACCESS TO PROPERTY

Name:

CAROL ANN PETIER

Address:

HWY 37 N (J. NEILS PARK)

LIBBY, MT.

Phone: 293-7781 EXT 238

Address of Property for which consent for entry and access is being granted:

SAHE

MAIL : 418 MINERAL AVE.
LINCOLN CO. PARKS &
RECREATION.

Relationship to property:
(i.e., owner, tenant, etc.)

DIRECTOR

I, the undersigned, am the owner, their representative, or otherwise control the real property at the location described above. The Environmental Protection Agency (EPA) has requested entry and access to my property pursuant to its response and enforcement responsibilities under the Comprehensive Environmental Response, Compensation and Liability Act as amended (Superfund), 42 U.S.C. 9601 et seq.

I consent to officers, employees, and authorized representatives of the EPA, including their authorized contractors, entering and having continued access to my property for the following purposes:

1. Visually inspecting the property, including the interior and exterior of any home or any other structures on the property;
2. the taking of such soil, bulk, or dust samples as may be determined to be necessary;
3. the taking of actions to mark or temporarily cover exposed vermiculite.

This written permission is given by me voluntarily with knowledge of my right to refuse and without threats or promises of any kind. I certify that this Consent for Entry and Access is entered into voluntarily and constitutes an unconditional consent and grant of permission for access to the property by officers, employees, and authorized representatives of EPA at reasonable times.

Date

8/6/02

Signature

Carol Ann Petier

Attachment 4

Letter Requesting Encroachment Permit





1331 17th Street, Suite 1050
Denver, Colorado 80202
tel: 303 295-1237
fax: 303 295-1895

July, 2003

Mr. Steve Herzog
Kalispell Maintenance
P.O. Box 7308
Kalispell, Montana 59904
(406) 751-2000

Subject: Request for Encroachment Permit

Dear Mr. Herzog:

The intent of this letter is to request from you an encroachment permit for the activities described below.

CDM Federal Programs Corporation (CDM) is currently under contract with the United States Environmental Protection Agency (EPA) to perform Remedial Investigation (RI) activities in and around Libby, Montana. As part of these activities, CDM has planned to collect surface soil samples along the right of way of Montana State Highway 37 between T30N R31W Section 3 and T31N R30W Section 32. This sampling will consist of collecting surficial (i.e., 0-6 inches below ground surface) soil from the right of way areas using hand trowels. No large equipment will be used during these activities that may interfere with traffic. These activities are projected to take approximately five days and are scheduled to occur sometime between July 8, 2003 and December 31, 2003.

If you need addition information please contact me at 303-295-1237 or monterajg@cdm.com

Thank You,

Jeff Montera
Project Manager
CDM Federal Programs Corporation

cc: Document Control Files